



IN THE DISTRICT COURT IN AND FOR TULSA COUNTY  
STATE OF OKLAHOMA

SANDRA CAUDLE,

Plaintiff,

vs.

TULSA COMMUNITY COLLEGE,

Defendant.

**CJ-2020 03519**

DOUG DRUMMOND

DISTRICT COURT

Case No.

NOV 18 2020

DON NEWBERRY, Court Clerk  
STATE OF OKLA. TULSA COUNTY

**PETITION FOR NEGLIGENCE**

COMES NOW the Plaintiff, Sandra Caudle, by and through her undersigned counsel and for cause of action against the Defendant, Tulsa Community College, alleges and state as follows:

**JURISDICTION AND VENUE**

1. Plaintiff is a resident of Tulsa County, Oklahoma.
2. Defendant is believed to be a resident of Tulsa County, Oklahoma.
3. The events which gave rise to this cause of action occurred in Tulsa County, Oklahoma.
4. That Tort Claim Notice was timely delivered to the Defendant and this matter is now timely filed.

**NEGLIGENCE AND DAMAGES**

5. Plaintiff incorporates the allegations set forth in paragraphs 1 and 4 above.
6. The events complained of occurred during the time period of February 2019 thru the end of May 2019.
7. The location of occurrence is Tulsa Community College, Metro Campus and the Administrative Offices.
8. That Tulsa Community College failed to properly handle a complaint made by the Plaintiff regarding her being stalked, harassed, and assaulted by a male student, J. P. Girouard.

9. Further, the Defendant retaliated against the Plaintiff by refusing to grant her access to a work study program.

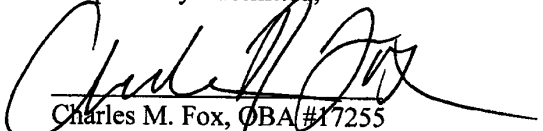
10. The acts and omissions of the Defendant resulted in a violation of her rights pursuant to Title IX.

11. As a direct and proximate result of the negligence, outrageous, wonton, and reckless disregard of the Defendant's rights set forth above by Defendant, Plaintiff has incurred expenses, has sustained pain and suffering of her body and mind, have sustained permanent injuries, have lost income all to her detriment in excess of \$75,000.00 and up to the statutory maximum allowed under the Tort Claim Act.

7. Defendant's actions and/or failure to act constitute a wanton and reckless disregard for the safety, health, and lives of Plaintiff and the public at large. As such, Plaintiff seeks an award of exemplary damages to punish Defendant for its conduct and to act as a safeguard for the public at large by deterring similar conduct in the future.

**WHEREFORE**, premises considered, Plaintiff pray that upon hearing she be awarded sums in excess of \$75,000.00 for her loss incurred herein, including but not limited to her person injury, lost income, lost opportunity for the benefit of the work study program, attorney fees, costs of this action, exemplary damages, and any other and further relief this court deems just and equitable.

Respectfully Submitted,

  
Charles M. Fox, OBA #17255  
Trevan V. Morrow, OBA #17915  
OKLAHOMA LITIGATION GROUP, LLC  
1705 South Baltimore Ave.  
Tulsa, Oklahoma 74119  
Telephone (918) 592-6554  
Facsimile (918) 619-9635  
**Attorneys for the Plaintiff**

**ATTORNEY LIEN CLAIMED  
WRITTEN FINDINGS OF FACT AND  
CONCLUSIONS OF LAW REQUESTED  
ON ALL ISSUES DECIDED BY THE  
BENCH ADVERSE TO PLAINTIFF  
JURY TRIAL DEMANDED**



Office of the General Counsel  
6111 East Skelly Drive, Suite 620  
Office: (918) 595-7995  
Fax: (918) 595-7994  
E-mail: [mackenzie.wilfong@tulsacc.edu](mailto:mackenzie.wilfong@tulsacc.edu)

February 4, 2020

Office of the Attorney General  
Litigation Section  
**ATTN: Docketing**  
313 N.E. 21<sup>st</sup> Street  
Oklahoma City, OK 73105

**VIA E-mail ([kindanne.jones@oag.ok.gov](mailto:kindanne.jones@oag.ok.gov))**

Dear Litigation Section Head:

Enclosed is a letter from Charles Fox, Esq. dated January 29, 2020 delivered to Tulsa Community College by USPS via certified mail today. The letter is addressed to the Tulsa Community College Board of Regents and states that it is a notice of a tort claim. The College is unaware if Mr. Fox filed a claim with Office of Management and Enterprise Services – Risk Management Department.

Sandra Caudle, the anticipated plaintiff, filed a complaint with the College regarding a male student. TCC employees, acting within the scope of their employment, investigated and appropriately addressed the matter.

I am respectfully requesting the Office of the Attorney General represent Tulsa Community College in this matter.

The primary contact person for this matter should be our in-house General Counsel, Mackenzie Wilfong, who can be reached at 918-595-7995, [Mackenzie.wilfong@tulsacc.edu](mailto:Mackenzie.wilfong@tulsacc.edu), and 6111 East Skelly Drive, Tulsa, OK 74135.

Sincerely,

A handwritten signature in black ink that reads 'Mackenzie Wilfong'.

Mackenzie Wilfong, Esq.  
General Counsel

ENCLOSURE

CONFERENCE CENTER  
6111 East Skelly Drive  
Tulsa, OK 74135

METRO CAMPUS  
909 S. Boston Ave.  
Tulsa, OK 74119

NORTHEAST CAMPUS  
3727 E. Apache St.  
Tulsa, OK 74115

SOUTHEAST CAMPUS  
10300 E. 81st St.  
Tulsa, OK 74133

WEST CAMPUS  
7505 W. 41st St. South  
Tulsa, OK 74107

[tulsacc.edu](http://tulsacc.edu)

**OKLAHOMA LITIGATION GROUP, L.L.C.**

ATTORNEYS AND COUNSELORS AT LAW

1705 S. Baltimore Avenue

Tulsa, Oklahoma 74119

Email: [info@myoklg.com](mailto:info@myoklg.com)

[www.myoklg.com](http://www.myoklg.com)

Charles M. Fox  
Trevan V. Morrow

Telephone: 918.592.6554  
Facsimile: 918.619.9635

January 29, 2020

Board of Regents  
Tulsa Community College  
Attn: Clerk of the Board  
3727 E. Apache St.  
Tulsa, OK 74115

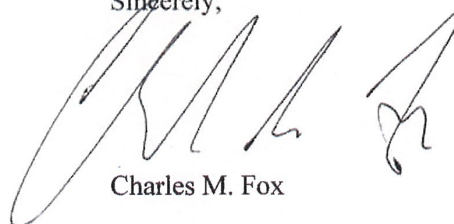
Re: *Tort Claim Notice*  
Sandra Caudle

Dear Sir or Madame:

Please be advised that I represent Sandra Caudle. This correspondence is to notify you that Ms. Caudle is making a claim against Tulsa Community College. The events complained of occurred during the time period of February 2019 thru the end of May 2019. The location of occurrence is the Metro Campus and the Administrative Offices regarding the handling of Ms. Caudle's complaints of stalking, harassment, assault by a male student, J. P. Girouard, and violation of rights pursuant to Title IX. The amount claimed is for the Statutory maximum or the policy limits of any insurance which provides coverage. Ms. Caudle resides at 1722 S. Carson Ave., Tulsa, OK 74119, (858)334-8513, and may be reached thru this office and the above stated address, telephone, or facsimile.

Please advise this office of any acceptance or denial of the claim, or any counter-offer you wish Ms. Caudle to consider. Should you have questions please feel free to call.

Sincerely,

A handwritten signature in black ink, appearing to be 'CM Fox', written over a horizontal line.

Charles M. Fox





OKLAHOMA LITIGATION GROUP, LLC  
1705 South Baltimore Avenue  
Tulsa, Oklahoma 74119

**CERTIFIED MAIL**



7014 1200 0000 2263 7328



**\$6.9**  
US POSTAGE  
FIRST-CLASS  
FROM 74  
JAN 30 2  
stamp  
end



Board of Regents  
Attn: Clerk of the Board  
Tulsa Community College  
3727 E Apache St  
Tulsa OK 74115-3151

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT  
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

*Board of Regents  
Tulsa Community College  
ATTN: Clerk of the Board  
3727 E. Apache St.  
Tulsa OK 74115*



9590 9403 0289 5155 1533 44

7014 1200 0000 2263 7328

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

**X**

- ☐ Agent  
☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

**3. Service Type**

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☐ Adult Signature Restricted Delivery  
☒ Certified Mail®  
☐ Certified Mail Restricted Delivery  
☐ Collect on Delivery  
☐ Collect on Delivery Restricted Delivery  
☐ Insured Mail  
☐ Insured Mail Restricted Delivery (over \$500)
- ☐ Priority Mail Express®  
☐ Registered Mail™  
☐ Registered Mail Restricted Delivery  
☐ Return Receipt for Merchandise  
☐ Signature Confirmation™  
☐ Signature Confirmation Restricted Delivery

PS Form 3811, April 2015 PSN 7530-02-000-9053

Domestic Return Receipt



TULSA  
COMMUNITY  
COLLEGE

CONFERENCE CENTER  
6111 East Skelly Drive  
Tulsa, OK 74135

Office of the Attorney General  
Litigation Section  
ATTN: Docketing  
313 N.E. 21<sup>st</sup> Street  
Oklahoma City, OK 73105

FIRST CLASS



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NOV 20 2020

ATTORNEY GENERAL

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